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A limited liability partnership formed in the State of Delaware

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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION
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13 DANIEL CISNEROS,

14 Plaintiff,

15 vs.
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17 J. VANGILDER, et al.,

18 Defendants.
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Case No. 4:16-cv-00735-HSG

**STIPULATION AND ORDER
RE: SCHEDULE FOR RENEWED
MOTION FOR ATTORNEYS' FEES**

Hon. Haywood S. Gilliam, Jr.

Courtroom: 2 – 4th floor

Oakland Courthouse

1301 Clay Street

Oakland, CA 94612

1 WHEREAS, on February 3, 2021, this Court denied plaintiff Daniel Cisneros's
2 motion for an award of attorneys' fees (dkt. 230);

3 WHEREAS, on May 4, 2021, this Court denied Cisneros's motion to vacate the
4 order denying the motion for attorneys' fees (dkt. 247);

5 WHEREAS, on May 12, 2022, the Ninth Circuit issued a memorandum opinion
6 that affirmed in part, reversed in part, and remanded this case to this Court to
7 determine the appropriate amount of fees to award (dkt. 249);

8 WHEREAS, on June 3, 2022, the Ninth Circuit issued its mandate (dkt. 250);

9 WHEREAS, on June 22, 2022, the Ninth Circuit issued an order granting
10 Cisneros's motion for an award of attorneys' fees incurred on appeal (dkt. 251); and

11 WHEREAS, the parties have conferred and wish to enter into settlement
12 discussions concerning the appropriate amount of fees to avoid further motion practice
13 and resolve this matter;

14 NOW, THEREFORE, the parties stipulate and agree to the following schedule to
15 allow the parties sufficient time to discuss settlement and respectfully request that the
16 Court enter the schedule as follows, to govern motion practice in the event that the
17 parties do not reach settlement:

- 18 1. Daniel Cisneros shall file his renewed motion for attorneys' fees on October 6,
19 2022.
- 20 2. Defendants shall file any opposition to the motion by October 20, 2022.
- 21 3. Daniel Cisneros shall file any reply in further support of the motion by
22 October 27, 2022.
- 23 4. The Court shall hear the renewed motion for attorney's fees on Thursday,
24 November 10, 2022, at 2:00 p.m.

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26 DATED: June 28, 2022
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1 ROB BONTA
2 *Attorney General of California*

REED SMITH LLP

3 By: /s/ Neculai Grecea
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Attorneys for Plaintiff Daniel Cisneros


Attorneys for Defendants
J. Vasquez and J. Vangilder

ORDER

1. Plaintiff Daniel Cisneros shall file his renewed motion for attorneys' fees on October 6, 2022.
2. Defendants shall file any opposition to the motion by October 20, 2022.
3. Plaintiff Cisneros shall file any reply in further support of the motion by October 27, 2022.
4. The Court shall hear the renewed motion for attorney's fees on Thursday, November 10, 2022, at 2:00 p.m.

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATE: 6/28/2022


The Honorable Haywood S. Gilham, Jr.
United States District Judge